

January 9, 2011

Federal Communications Commission

Via Internet: <http://www.fcc.gov/pea>

SUBJECT: COMMENT LETTER ON THE ENVIRONMENTAL EFFECTS OF ITS ANTENNA
STRUCTURE REGISTRATION PROGRAM

WT Docket No. 08-61 National Environmental Policy Act Compliance for Proposed Tower
Registrations

WT Docket No. 03-187 Effects of Communications Towers on Migratory Birds

The San Diego Audubon Society is very concerned that the FCC is permitting large numbers of communications towers with virtually no analysis of the significant project level and cumulative impacts of them, a clear violation of NEPA. A PEIS is the appropriate document for this analysis. The proposed PEA will needlessly prolong that lack of adequate analysis. We also urge that the scope of whatever NEPA document is provided be adequate. We will address these issues in the following paragraphs.

PEA VS. PEIS

The FCC has sponsored a report by Avatar Environmental in 2004 that identifies a large volume of information that clearly demonstrates that telecommunications towers cause huge deaths of birds in single incidents (thousands in a single night at a single tower) and huge cumulative numbers of deaths from smaller daily incidents over large numbers of towers. These incidents impact millions of birds each year including endangered, threatened, declining, and common species. There is no real question that an Environmental Impact Statement is required to identify and quantify these significant impacts, to identify less damaging alternatives, and to provide adequate mitigation.

The PEA is a waste of time, money, and wildlife. Millions more birds and bats will be killed during the writing, review, and approval of the PEA. It must conclude that an EIS is required. The demand is increasing briskly for towers for mobile phones and for broad band internet. The permitting of these towers should be guided by a PEIS to reduce their impacts. It would be dysfunctional and deadly to delay the PEIS and therefore permit these thousands of towers to be built without the guidance of the PEIS, as is currently planned.

SCOPE OF NEPA DOCUMENT

We urge that any NEPA document include an analysis of at least the following items:

- ? An itemization of the number of bird or bat kills at communication towers, based on counts and realistic projections.
- ? An itemization of the number of towers currently in place including the characteristics that effect bird strikes such as location in area of high bird or bat activity or migration, height of tower, what sort of lighting is on it, whether it has guy wires, surrounding habitat type and value, how many deaths have been detected on each, and the likelihood that a dead bird would be detected at that site.
- ? The number of new towers that are anticipated with the characteristics described in the previous bullet for each tower including a projection of the bird and bat mortality that it would cause.
- ? Assessment of the cumulative impacts of existing towers and of existing towers plus anticipated towers including impacts on at-risk, threatened, and endangered species.

ALTERNATIVES THAT SHOULD BE ADDRESSED

We urge that the NEPA document analyze a variety of alternatives that may reduce or eliminate the impacts to birds such as the following:

- ? Require that antennas be constructed without guy wires.
- ? Require that all aircraft warning lights on communication towers flash at a rate that reduces their attraction to birds and prohibit lights that are on continuously.
- ? Reduce the intensity of aircraft warning lights consistent with safety considerations.
- ? Require that antennae be placed on existing towers vs. constructing additional towers where possible.
- ? Consult with the US Fish and Wildlife Service on all towers that could affect sensitive species.
- ? Require modification or removal of any towers that have more than minimal impacts on birds or bats.

LOCAL IMPORTANCE

It appears that little bird mortality data related to communications towers is available for the western US. We urge that programs to assess these impacts in the west be accelerated.

CONCLUSION

We urge that a PEIS be completed quickly to avoid or at least reduce bird and bat mortality due to communication towers. We also urge that the FCC take a much more active role in the analysis of the cumulative and project by project wildlife impacts of communication towers and in regulating the construction, upgrading, and operation of those towers to reduce or avoid the environmental impacts.

In case of questions or follow-up, the undersigned can be reached at 619-224-4591 or peugh@cox.net.

Respectfully,

James A. Peugh
Conservation Committee Chair

Cc
Congresswoman Susan Davis, via email